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6/25/03

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Serial No. : 09/259,770  
Applicant(s) : Stephen J. HODGDON et al.  
Filed : February 26, 1999  
Title : METHOD OF RISK MANAGEMENT AND OF ACHIEVING A RECOMMENDED  
ASSET ALLOCATION AND WITHDRAWAL STRATEGY, AND COMPUTER  
READABLE MEDIUM, APPARATUS AND COMPUTER PROGRAM THEREOF

Art Unit : 3624  
Examiner : Jagdish PATEL

Docket No. : 3635-4000

**AMENDMENT UNDER 37 C.F.R. 1.111**

Mail Stop NO FEE  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

In response to the Office Action of March 20, 2003, please amend the above-identified application as follows:

**Amendments to the Claims** are reflected in the listing of claims which begins on page 2 of this paper.

**Remarks** begin on page 13 of this paper.